

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i></div> <div>Debtors.¹</div>	<div>PROMESA Title III</div> <div>Case No. 17 BK 3283-LTS (Jointly Administered)</div>
<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>PUERTO RICO ELECTRIC POWER AUTHORITY,</div> <div>Debtor.</div>	<div>PROMESA Title III</div> <div>Case No. 17 BK 4780-LTS</div> <div>Re: ECF Nos. 814 (Case No. 17-4780), 2980 (Case No. 17-3283)</div>
<div>WIDERANGE CORPORATION,</div> <div>Movant,</div> <div>-against-</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>PUERTO RICO ELECTRIC POWER AUTHORITY,</div> <div>Respondent.</div>	<div>This Joint Motion Relates Only to PREPA and Shall Only be Filed in Case Nos. 17 BK 3283-LTS and 17 BK 4780-LTS</div>

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**JOINT MOTION IN COMPLIANCE WITH ORDER RELATED TO
WIDERANGE CORPORATION'S MOTION FOR RELIEF OF STAY**

To the Honorable United States District Court Judge Laura Taylor Swain:

On behalf of the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF") pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority*, Act 2-2017, and Movant, Widerange Corporation ("WR"), respectfully submit this Joint Motion in Compliance with Order Related to Widerange Corporation's Motion for Relief of Stay (the "Motion"). In support of the Motion, the parties respectfully state as follows:²

1. On July 16, 2018, this Court entered an order granting WR's unopposed request for an extension of time to file a joint report and extended the deadline to July 25, 2018 [Dkt. No. 3525]. The joint report pertains to this Court's order entered on May 1, 2018 (the "Initial Order") concerning the parties' "efforts to seek to develop a mutually acceptable resolution of the outstanding performance bond issue or, at minimum, an agreed statement regarding the nature and pendency of the stayed litigation that can be used in connection with inquiries as WR's bids for business." [Dkt. No. 2980 at 6].

2. In compliance with the Initial Order, on July 25, 2018, the parties informed the Court of the efforts made by both parties to reach an agreement as related to the nature and pendency of the stayed litigation and WR's concerns regarding the potential impact of the pending litigation in relation to its commercial prospects with PREPA [Dkt. No. 3697].

3. On August 27, 2018, the parties informed the Court that the parties were in communication and still in the process of discussing possible alternatives and drafting a mutually

² The Financial Oversight and Management Board for Puerto Rico, as the Debtors' representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA"), has authorized AAFAF to join in this Motion on behalf of PREPA.

acceptable statement, and requested until September 7, 2018 to inform the Court of the status of a mutually agreeable statement regarding both parties' concerns going forward [Dkt. No. 3812].

4. On September 7, 2018, the parties informed the Court that they met on August 30, 2018 to discuss alternatives to resolve the pending issues and scheduled a meeting for the week of September 10-14, 2018, and requested until October 7, 2018 to inform the Court of the status of their efforts [Dkt. No. 3896].

5. On October 5, 2018, the parties informed the Court that they are in communication and still in the process of discussing possible alternative and drafting a mutually acceptable statement, and requested until October 22, 2018 to inform the Court of the status of their efforts [Dkt. No. 4023].

6. On October 22, 2018, the parties informed the Court they are still in the process of drafting a mutually acceptable statement, and requested until November 16, 2018 to inform the Court of the status of their efforts [Dkt. No. 4083].

7. The parties hereby inform the Court that the parties are in the process of exchanging draft versions of an agreement to resolve the issues outlined in the Initial Order and respectfully request that the Court allow the parties until December 7, 2018 to file a joint status report on these additional efforts.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this date, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

In San Juan, Puerto Rico, this 16th day of November, 2018.

**THE PUERTO RICO ELECTRIC POWER
AUTHORITY**

By its attorneys,

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